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### **REMARKS**

Reconsideration and allowance of Claims 1-12 of the subject application are respectfully requested. Claim 1 has been amended.

#### **First Rejection Under 35 USC 103**

Claims 1-8 and 11 are rejected under 35 USC 103 (a) as unpatentable over Russian Patent No 432934 (Russian Patent) in view of Canadian Patent No 739,652 (Canadian Patent).

The use of the two banks of jets in the Russian Patent are intended to assure complete penetration to provide a fluidized bed in the interior of the thick web. To the that end, claim 1 has been amended to recite that the jets impinge on only one surface of the sheet at a time rather than both planar surfaces simultaneously as disclosed in the Russian Patent.

The Canadian Patent is offered to show that a fiber batt can be formed by carding. However, this reference does not cure the deficiencies of the Russian Patent, particularly in view of amended claim 1.

It is respectfully submitted that a prima facie case of obviousness has not been established and that the rejection should be withdrawn.

#### **Second Rejection Under 35 USC 103**

Claims 1-4, 8-10, and 12 are rejected under 35 USC 103 (a) as unpatentable over US Patent 6,571,441 to Kobayashi et al (Kobayashi) in view of US Patent 3,353,225 to Dodson Jr. et al (Dodson).

The Examiner offers Kobayashi as disclosing that fluid jets are offset at an appreciable angle from the perpendicular with respect to the web. The Examiner argues that the X-direction in Fig. 1 of Kobayashi defines a perpendicular direction of the web. Both the X and Y directions in Fig. 1 of Kobayashi lie in the plane of the web and are merely perpendicular to each other. However, in an attempt to advance the prosecution, claim 1 has been amended to recite that the streams of fluid impact the surface of the web at an appreciable angle from the perpendicular with respect to the planar surface of the web. There is no disclosure or suggestion that the streams in Kobayashi impact the web surface at anything but a direction that is perpendicular to the surface of the web.

Dodson does not add anything to cure the deficiencies of Kobayashi, particularly in view of amended claim 1. Therefore, it is respectfully submitted that a prima facie case of obviousness has not been established and that the rejection be withdrawn.

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**Third Rejection Under 35 USC 103**

Claims 1-4, 8-9, 11, and 12 are rejected under 35 USC 103 (a) as unpatentable over Kobayashi in view of US Patent 3,873,255 to Kalwaites (Kalwaites).

Kobayashi does not render the subject claims obvious for the same reasons as noted above. Kalwaites does not add anything to cure the deficiencies of Kobayashi, particularly in view of amended claim 1. As such, it is respectfully requested that the rejection be withdrawn.

**Allowable Subject Matter**

Applicant gratefully acknowledges that claim 13 has been deemed allowable.

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**CONCLUSION**

It is believed that the foregoing is a complete response to the subject Office Action. If any matters remain for resolution, please contact the undersigned.

Respectfully submitted,



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